

LAW OFFICES OF D. SCOTT DATTAN  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
vs.	)	
	)	
CARLOS RAINEY, et al	)	
	)	
Defendant.	)	
_____	)	Case No. 3:05-cr-108-JWS

**JOINT MOTION TO EXTEND**  
**DATE FOR PRETRIAL MOTIONS**

This joint motion is made on behalf of CJA counsel for defendants Shannon Rainey, D'Andre Tolbert, Krista Ann Callan, Alexander Booker and Alfredo Martinez. These parties hereby join in the motion filed on behalf of Carlos Rainey (Docket No. 191) and is also filed as a joint motion to extend the motions deadline until at least April 15, 2006.

Extension of time is necessary, not just because of the volume of discovery, but also because the discovery has been provided in a piecemeal fashion. The alternative to extending the March 15<sup>th</sup> deadline is to subject the court to various motions to accept late-filed motions due to the length of time required to review the discovery in this case.

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This motion is supported by the affidavit of counsel filed herewith. Granting this motion may cause a period of excludable delay pursuant to 18 USC 3161(h).

DATED this 14<sup>th</sup> day of March, 2006.

s/D. Scott Dattan  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2006, a copy of foregoing JOINT MOTION TO EXTEND DATE FOR PRETRIAL MOTIONS was served electronically on: Stephan Collins, Mike Dieni, Allan Beiswenger, William Carey, John C. Pharr, Scott Sterling, Lance Wells, T. Burke Wonnell, Mark Rosenbaum, Raul Martinez, and Hugh Fleischer.

s/D.Scott Dattan